



Ethics Office Monthly Report

MWD
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA



June 2019 REVISED

ETHICS OFFICE REVIEW

Biennial Conflict of Interest Code Review

Reached significant milestone in inter-departmental effort on review and enhancement of Ethics Office policies and procedures.

Effort culminated in extensive proposed amendments to Administrative Code, as distributed at the June Audit and Ethics Committee meeting.

Deliberations over policy proposals and drafting involved over 20 hours of videoconferences between Ethics staff, Legal Department, and special outside counsel.

Topics include:

- Clearer division of responsibilities between Ethics Office and other Departments.
- Enhancement of conflict of interest rules.
- Registration and reporting by lobbyists.
- Applying ethics standards to outside contractors.
- New targeted education programs.
- Incentives for obtaining Ethics Office advice and guidance.
- Streamlined investigation procedures with new safeguards for notice and timing.
- Guidelines for public disclosure of investigation results.

The commitment of energy and resources from the Office of General Counsel, working in collaboration with outside counsel and the Ethics Office staff, made these developments possible.

COMPLIANCE

Biennial Conflict of Interest Code Review

Continued collaboration with Human Resources staff on the state-mandated biennial Conflict of Interest Code review. Ethics and HR staff discussed new and existing job classifications and whether they should be required to file Form 700.

As part of this process, the Ethics Office is reviewing the financial disclosure obligations of outside investment managers.

Form 700

Continued efforts to achieve full compliance for the 2018 Annual Form 700 filing. To date, all directors have filed. Only two of the approximately 600 employees required to file an annual report have not filed.

Assisted Board members and employees filing Assuming, Leaving Office, and Annual Form 700s.

Monitored the status of Assuming Office and Leaving Office Form 700 filings and sent notifications to filers to increase compliance.

ADVISORY SERVICES

Responded to requests for advice involving financial disclosure, conflicts of interest, recusals, inspection trips, gifts from vendors,

and outside employment.

Created monthly conflicts bulletin for directors in collaboration with the General Counsel.

EDUCATION AND TRAINING

Presented introduction and overview of Ethics Office at new employee orientation sessions.

INVESTIGATIONS

The Ethics Office receives complaints from both internal and external sources. Staff conducts an initial review of each complaint to determine if the implicated policies fall within the area of responsibility of the Ethics Office, Employee Relations, or both.

Processed three matters as follows:

1. Complaint alleging a manager retaliated against a subordinate for reporting alleged workplace safety violations. This matter is currently under review.
2. Complaint alleging discrimination and retaliation by a supervisor. The discrimination portion was referred to EEO and the retaliation portion is currently under review.
3. Complaint alleging a conflict of interest by a supervisor. This matter was closed because the alleged facts do not constitute a violation.

Ethics Office Dashboard

Quarterly Update

(April 1 – June 30, 2019)

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Advisory Services

< 5 hours	5-20 hours	> 20 hours
34 matters	8 matters	0 matters
150+ staff hours (Primarily Form 700 Assistance)		

Ethics Compliance

COI Code	Training	Form 700 Admin/Assist
600+ staff hours (Primarily Form 700 Assistance)		

Investigations

< 5 hours	5-20 hours	> 20 hours
3 matters	6 matters	5 matters
400+ staff hours (Primarily one complex investigation)		

Other

Policy	Special Projects	General Administrative
650+ staff hours (Primarily the Ongoing Ethics Office Policy/Procedures Review)		

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